

EXHIBIT E

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
NO. 96-
11651-PBS

UNITED STATES OF AMERICA, *ex rel. DAVID FRANKLIN *
Plaintiff, * v. *
PARKE-DAVIS, DIVISION OF *WARNER-LAMBERT COMPANY, *
Defendant. *****
VOLUME IV OF THE DEPOSITION OF DAVID FRANKLIN, a witness
called on behalf of
the Defendant, taken pursuant to the Federal Rules of Civil Procedure,
before Maureen
O'Connor Pollard, RPR and Notary Public within and for the Commonwealth of
Massachusetts, at
the offices of Hare & Chaffin, 160 Federal Street, Boston, Massachusetts, on
Tuesday,
November 21, 2000, commencing at 9:58 o'clock a.m.
O'CONNOR POLLARD REPORTING 32 Shady Lane
Franklin, Massachusetts 02038 800-528-2951
(508)-528-2950
FAX: (508)-528-3927

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1 Q. And this is -- this tape of this conference
2 call starting on page eighteen, this is the only
3 tape that you have of any of those meetings?
4 A. Right.
5 Q. Do you remember anything -- let's talk
6 about the Farmingham meeting. Do you recall in
7 particular who was present?
8 A. I believe it was everybody in the Northeast
9 CBU.
10 Q. Do you remember when this was?
11 A. I don't recall the specific date.
12 Q. Did it include Mike Valentino?
13 A. Yes.
14 Q. John Ford?
15 A. I believe so. I'm not sure.
16 Q. John Krukar?
17 A. Yes.
18 Q. Phil Magistro?
19 A. Yes.
20 Q. The other medical liaisons?
21 A. Yes.
22 Q. Area business managers?
23 A. I believe so. Again at this point I didn't
24 know who all the area business managers were,

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